

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE**

**UNITED STATES OF AMERICA**

**v.**

**RYAN J. VALLEE**

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**1:15-cr-00115-01-PB**

**FIRST SUPERSEDING INDICTMENT**

The Grand Jury charges:

**Background**

1. At all times relevant to this indictment, defendant RYAN J. VALLEE, using aliases that included “Seth,” “Seth Williams,” “Seth William Banks,” “James,” and “James McRow,” resided in the District of New Hampshire.
2. Yahoo! Inc. (“Yahoo!”) provided electronic mail (“e-mail”) and other electronic communications services to users all over the world.
3. Google, Inc. (“Google”) provided electronic mail (“e-mail”) and other electronic communications services to users all over the world.
4. AOL, Inc. (“AOL”) provided electronic mail (“e-mail”) and other electronic communications services to users all over the world.
5. Facebook, Inc. (“Facebook”) provided social networking and other electronic communications services to users all over the world.
6. Instagram, Inc. (“Instagram”) provided photograph sharing and other electronic communications services to users all over the world.
7. Skype, Inc. (“Skype”) provided text, voice, and video communications to users all over the world.

8. Amazon, Inc. (“Amazon”) provided online merchant services to users all over the world. Users stored in their Amazon account personally identifiable information that included their name, address, and payment card information.
9. Pinger, Inc. (“Pinger”), which is based in California, provided free “spoofing”/anonymizer text messaging services to users all over the world. By using Pinger’s “textfree” messaging service, a user could select a different telephone number and then send text messages, as well as photographs, that appeared to originate from that “spoofed” number. This in turn allowed the user to disguise his true identity when communicating with others. Using “textfree,” users can send text messages over the internet to and from any internet-connected device, such as a laptop computer, iPod, or cell phone. At all times relevant to this indictment, Pinger’s computer servers were located in California and all of Pinger’s customers’ “textfree” communications traveled through Pinger’s California-based servers.
10. At all times relevant to this indictment, persons whose identities are known to the Grand Jury and known to the defendant but are identified herein as “Jane Doe 1” through “Jane Doe 13,” were females, ranging in ages from approximately 15- to 19 years-old, who resided in the District of New Hampshire.
11. From in or about 2011 through in or about November 2013, VALLEE engaged in a computer hacking and “sextortion” campaign designed to force numerous teenaged females, including Jane Doe 1 through Jane Doe 13, to provide him with sexually explicit photographs of themselves. VALLEE employed a variety of techniques to force the victims he targeted to comply with his “sextortionate” demands. For example, VALLEE repeatedly accessed, without authorization (“hacked” into), and took control over, the

victims' online accounts. Once inside those hacked accounts, VALLEE locked the victims out of their own accounts, he sometimes defaced the contents of the accounts, and he sometimes used their stored payment account data to purchase, without authorization, products of a sexual nature. In some instances, VALLEE also obtained sexually explicit photographs of the victims and their friends and distributed the sexually explicit photographs to others. With this backdrop, VALLEE, disguising his true identity and using various aliases, repeatedly sent threatening electronic communications to the victims, telling them that, unless they gave him sexually explicit photographs of themselves, he would continue with the above-described conduct. When most of the victims refused to comply with VALLEE's demands and begged him to leave them alone, VALLEE responded with threats to inflict additional harm.

### **Hacking Into Online Accounts**

12. From in or about 2011 through in or about November 2013, VALLEE repeatedly accessed, without authorization ("hacked"), numerous teenaged females' online accounts, including their accounts with Facebook, Instagram, Yahoo!, Google, AOL, and Amazon.com. He typically did this by guessing the answers to the security questions on these accounts, which is a way for users to reset a forgotten password, and then changing the account passwords.
13. Once VALLEE had hacked into the victims' accounts, he took control over their accounts, changed the passwords to their accounts, and prevented the victims from accessing their own accounts. In several instances, VALLEE defaced their social networking account pages by, for example, publishing embarrassing photographs and text on their Facebook pages.

**Stealing Payment Card Information and Making Unauthorized Purchases of Sex-Related Products**

14. In one or more instances, from in or about 2012 through in or about November 2013, VALLEE hacked into one or more victims' accounts with the online merchant Amazon.com, which stored the victims' payment card information and shipping address.
15. VALLEE then used the victims' payment card information stored on their Amazon.com accounts to make unauthorized purchases of sex-related products, which he then had shipped to the victims' home addresses.

**Sending Threatening Online Communications and Sexually Explicit Images**

16. Beginning in or about 2010, VALLEE created accounts with one or more text message "spoofing"/anonymizer services, including Pinger's "textfree" service. VALLEE then used Pinger's "textfree" service and similar services to send text messages, and photograph attachments, from "spoofed" phone numbers generated by those services, so that the recipients would not know VALLEE's true phone number or identity.
17. From approximately 2012-November 2013, using the "textfree" text message "spoofing" services and other methods of online communication, VALLEE sent multiple communications to numerous victims, which travelled in interstate commerce.
18. In these communications, VALLEE, using various aliases, threatened the victims in an attempt to force them to provide him with sexually explicit photographs of themselves.
19. For example, VALLEE notified the victims that he had hacked into their various online accounts. He then demanded that they provide him with sexually explicit photographs of themselves in order to regain access to and control of their hacked accounts. In some cases, he threatened to continue hacking, to delete, and to deface their hacked accounts

unless the victims provided him with sexually explicit photographs of themselves. If the hacked account was with the online merchant Amazon.com, VALLEE often threatened to make unauthorized purchases from the accounts unless the victims provided him with sexually explicit photographs of themselves.

20. In multiple instances, VALLEE, again using various aliases, notified the victims that he had obtained sexually explicit photographs of them and of their classmates. He then threatened to distribute these sexually explicit photographs to others unless the victims provided him with sexually explicit photographs of themselves. As proof that he could carry out his threats, VALLEE sent the victims sexually explicit photographs of themselves and their classmates, who were also teenaged females.

**Jane Doe 1**

21. In or about August 2012, VALLEE hacked into the Facebook account and Google e-mail account belonging to Jane Doe 1, took control of the accounts, and locked Jane Doe 1 out of her accounts.
22. In or about August 2012, VALLEE sent multiple texts to Jane Doe 1 telling her that he had obtained one or more sexually explicit photographs of her and had hacked her accounts. As proof, VALLEE sent Jane Doe 1 one or more sexually explicit photographs of Jane Doe 1. VALLEE threatened Jane Doe 1 that he would distribute the photograph(s) of Jane Doe 1 widely on the internet and continue hacking her accounts unless she sent him additional sexually explicit photographs of herself.
23. For example, in a series of texts that VALLEE sent to Jane Doe 1 in or about August 2, 2012, VALLEE stated, "If you don't want me to set that as your profile picture on Facebook take your bra off . . . You have 15 minutes . . . I hacked your Facebook [sic] if

you don't show me your tits I will set this as your profile picture [sic] nice pussy too girl. You don't have a choice. If I don't see your tits by ten everyone will see your pussy. Don't make me do this [Jane Doe 1's first name]. I hacked you once I can hack you again."

24. In or about August 2012, VALLEE sent a text message to Jane Doe 1's sister, who was also a teenaged female, which had as an attachment the same sexually explicit photograph of Jane Doe 1 that VALLEE had previously sent to Jane Doe 1.
25. In or about August 2012, VALLEE defaced Jane Doe 1's Facebook account, changing her Facebook "profile" photograph to a photograph of Jane Doe 1 wearing a bikini.
26. In or about August 2012, VALLEE, having taken over Jane Doe 1's Facebook account, used Jane Doe 1's Facebook identification to communicate online with others. Posing as Jane Doe 1, VALLEE sent Facebook messages to several of Jane Doe 1's Facebook "friends." VALLEE attempted to elicit personally identifiable information from her friends.

#### **Jane Doe 2**

27. In or about July 2012, VALLEE hacked into the Instagram account and AOL e-mail account belonging to Jane Doe 2, took control of the accounts, and locked Jane Doe 2 out of her accounts.
28. In or about July 2012, VALLEE sent Jane Doe 2 multiple texts threatening to delete and block her access to her accounts unless she sent him sexually explicit photographs of herself. He stated that he would give her access to her online accounts only if she complied with his demands.

29. For example, in a series of texts VALLEE sent to Jane Doe 2 on or about July 17, 2012, VALLEE stated “Will you show boobs . . . I will delete your instagram. I changed your password just now. Trade titty picture for your instagram. [Jane Doe 2’s first name]. Instagram will be deleted tomorrow at midnight if there is no naked picture of you. Do you understand . . . Do you want instagram [sic]. Show boobies. You have until midnight . . . Send it to your email so I can see it. Stop stalling. Send it to your e-mail or I will delete your instagram.” He warned, “Good luck replacing all of the pictures. I won’t leave you alone unless you send it.” He then stated “I want a picture you . . . bitch. Send the picture . . . Send it . . . Tits. Naked.”

**Jane Doe 3**

30. In or about July and August 2012, VALLEE hacked into the Facebook account and Google e-mail account belonging to Jane Doe 3, took control of the accounts, and locked Jane Doe 3 out of her accounts.
31. In or about July and August July 2012, VALLEE sent Jane Doe 3 multiple texts notifying her that he had hacked into her accounts and threatening to delete her accounts unless she sent him compromising photographs of herself. He further warned Jane Doe 3 that each day she delayed, he would demand that she remove an additional layer of clothing. He stated that he would give her access to her online accounts only if she complied with his demands.
32. For example, in a series of texts VALLEE sent to Jane Doe 3 on or about July 25-26, 2012, VALLEE stated, “Put jeans on and take a picture of how your butt fills them or Facebook will be deleted [sic] don’t tell anyone! I am waiting. I am waiting. Do this or I delete facebook. You have ten minutes. I hacked your Facebook and emails [sic] do

this or they will be deleted. Three minutes left. ONE MINUTE. Time is up. I read your emails . . . I want a picture of your butt in jeans . . . I won't stop until you do this [sic] okay I have all of your email addresses [sic] hacked as well. Do we have a deal [sic]."

When Jane Doe 3 refused, VALLEE warned her, "Each day you procrastinate sending this one layer of clothes will need to be removed." VALLEE continued, "You need your email for college. You have been hacked again. Hacked gmail again hehehe."

VALLEE then stated, "Do you enjoy anal [sic]. I want to lick your pussy."

33. For example, in a series of texts VALLEE sent to Jane Doe 3 on or about July 27, 2012, VALLEE stated, "if you need your passwords to get back into your emails just text me for them. I was planning on getting naked photos of you and [first name of classmate of Jane Doe 3] but it is wrong to force someone to do this I repent for these crimes against you . . . I regret doing this to all those other girls . . . it is wrong." He later continued to demand that Jane Doe 3 answer personal questions about herself and asked her, "Can you tell [first and last name of Jane Doe 11] to text me I want to give her password to her . . . I have had her Facebook for three weeks."

34. For example, in a series of texts VALLEE sent to Jane Doe 3 on or about July 28-29, 2012, after Jane Doe 3 asked him, "Are you trying to get on my facebook again," he responded, "I have to check something it will take two minutes I promise." He repeated, "To check something it will be real fast I will even tell you password . . . . Will you help me? . . . Got in. If you corporated [sic] I would have been done but you were a bitch so I locked you out. Do you want it back [sic] . . . Your password is . . . " . . .

35. For example, in a series of texts VALLEE sent to Jane Doe 3 on or about July 30, 2012, VALLEE stated, "Talk to me. Have a conversation or I hack you . . . Have a



conversation with me,” and proceeded to ask her a series of personal questions. He continued, “Just talk to me . . . or I will hack you . . . Don’t make me hack you toots . . .” and again asked her personal questions, again stating, “Don’t make me hack you . . . I will lock you out. Tell me . . . what color panties you have on . . . What color panties do you have on? What color panties do you have on? What color panties do you have on? What color panties do you have on? How good would that feel inside you. Hahah you are probably fingering yourself to it. I was a little bit drunk and that is not my penis I googled it.”

36. In or about July 30, 2012, VALLEE sent via text to Jane Doe 3 a sexually explicit photograph that depicted a male’s genitals.
37. For example, in a series of texts VALLEE sent to Jane Doe 3 on or about August 1, 2012, VALLEE stated, “I want to date you. [First name of Jane Doe 3] I want to date you. I’m going to hack you again okay?” When Jane Doe 3 threatened to go to the police, VALLEE responded, “I am not afraid of police [sic] they have been looking for me for over a year,” and then demanded that Jane Doe 3 provided him with the cell phone number of one of her classmates. VALLEE stated, “Look her up I need her number. Will you help me. Do not make me hack you.”
38. In or about August 3, 2012, VALLEE sent via text to Jane Doe 3 a sexually explicit photograph of Jane Doe 1, with the message, “Guess who [sic] photo that is [sic]. I scare myself. This is her. This could be yours.”

**Jane Doe 4**

39. In or about April 2012, VALLEE hacked into the Facebook account and Yahoo! e-mail account belonging to Jane Doe 4, took control of the accounts, and locked Jane Doe 4 out of her accounts.
40. In or about April 2012, in or about September 2012, and in or about January 2013, VALLEE sent Jane Doe 4 multiple texts and other electronic communications demanding that she send him sexually explicit photographs of herself.
41. In or about April 2012, September 2012, and January 2013, VALLEE sent Jane Doe 4 multiple texts and other electronic communications telling her that he had one or more photographs of her of a sexual nature. He threatened to distribute the photograph(s) widely on the internet unless she sent him additional sexually explicit photographs of herself. As proof, VALLEE sent Jane Doe 4 a photograph that showed Jane Doe 4's naked buttocks.
42. In or about April 2012, September 2012, and January 2013, VALLEE sent Jane Doe 4 a series of texts and other electronic communications in which he notified Jane Doe 4 that he had hacked into her Facebook and Yahoo! e-mail accounts and would give her access to her online accounts only if she complied with his demands.
43. For example, in a series of texts VALLEE sent to Jane Doe 4 on or about April 16, 2012, VALLEE stated "I need a naked pic of you." When she refused, VALLEE stated, "I'm just going to show your ass shots to [first name of a classmate of Jane Doe 4's]. Send me a picture. Your friends did. [First and last names of four of Jane Doe 4's classmates, including Jane Doe 7 and Jane Doe 12] and more . . . If you don't send me a nude by 8, Im [sic] sending this picture to people and uploading them to Facebook." When Jane Doe

4 again refused, VALLEE stated, “Now take a naked picture. Okay fine. Im [sic] uploading your ass pix to your facebook.” Jane Doe 4 then warned him that she would contact the police and that he would go to jail for “kid pornography,” and VALLEE responded, “Ha ha, calling the cops won't stop your friends from seeing. . . They can't find me. I already went through this with [first and last name of Jane Doe 4's classmate, Jane Doe 12].” When Jane Doe 4 threatened to tell her mother, VALLEE responded, “Trust me, I made sure I am untraceable. Just one picture [first name of Jane Doe 4] and I will end this. Send it . . . I just want one full frontal nude . . . Same deal I made with [first name of Jane Doe 12]. I will leave you alone after. . . Just one picture.” When Jane Doe 4 begged him to “get off my FB [Facebook page],” he responded, “Send me a naked picture . . . As soon as I get a nude of you. Take your clothes off. Get fucking naked on camera. . . . I'm going to have fun fucking you this summer.”

44. For example, in a series of Facebook messages that VALLEE sent to Jane Doe 4 on or about September 24, 2012, VALLEE stated, “Im [sic] going to add [first name of Jane Doe 4's mother] if you don't talk to me. Im [sic] showing them your nude photos . . . . [Im] sending friend requests to your friends . . . Last chance to talk to me before I add your mommy . . . Do I have to add [first name of Jane Doe 4's mother].” VALLEE continued, “I sent your ass pictures to a few people don't make me show more. [First name of Jane Doe 4's mother's] is next. Show me those breasts.” VALLEE stated, “Get naked. Do you want this to end. Show me. I am currently in New Hampshire [sic] I know you live [inserting details about where Jane Doe 4 lived] and you work at [company name of Jane Doe 4's employer]. Show me your nipples. [First name of Jane

Doe 4] show me now to end this or I will never leave you alone . . . Don't make this hard on your self [sic]. I just sent your mom a friend request."

45. For example, in a series of texts that VALLEE sent to Jane Doe 4 on or about January 19, 2013, VALLEE stated, "Send me the photo you promised and I shall return facebook and yahoo too [sic] you . . . Do you want facebook and yahoo back? [First name of Jane Doe 4.] Send me my photo and you can have everything back . . . Your password is fuckmehard69. Send me the promised photo and this will end."

#### **Jane Doe 5**

46. In or about April 2012, VALLEE hacked into the Facebook account belonging to Jane Doe 5, took control of the account, and locked Jane Doe 5 out of her account.
47. In or about April 2012, VALLEE sent Jane Doe 5 multiple texts demanding that she send him one or more sexually explicit photographs of herself. He threatened to post one or more compromising photographs of Jane Doe 5 on her hacked Facebook page unless she sent him the sexually explicit photograph. He also threatened to distribute a sexually explicit photograph of Jane Doe 5's classmate, Jane Doe 12. As proof, VALLEE then sent Jane Doe 5 a sexually explicit photograph of a classmate of Jane Doe 5, Jane Doe 12, who was also a teenaged female.
48. For example, in a series of texts VALLEE sent to Jane Doe 5 on or about April 23, 2012, VALLEE stated "Not until I see [you] naked. What if I set this sexy g string picture as [your] facebook profile picture. You have ten minutes. If I don't have a naked picture of you by 12:10 everyone will see this [an attachment that contained one or more sexually explicit photographs of Jane Doe 5's classmate, Jane Doe 12]."

**Jane Doe 6**

49. In or about December 2012, VALLEE hacked into the Amazon.com account, Facebook account, and AOL email account belonging to Jane Doe 6, took control of the accounts, and locked Jane Doe 6 out of her accounts.
50. In or about December 2012, after hacking into Jane Doe 6's Amazon.com account, VALLEE used, without authorization, Jane Doe 6's payment card information that was electronically stored in her Amazon.com account. He purchased, and shipped to Jane Doe 6's home address, merchandise of a sexual nature. This included an item called a "waterproof rabbit vibrator."
51. In or about December 2012 and March 2013, VALLEE sent Jane Doe 6 a series of texts in which he notified Jane Doe 6 that he had hacked into her Amazon, Facebook, and AOL accounts, and he told her he would give her access to her online accounts only if she sent him sexually explicit photographs of herself.
52. For example, in a series of texts VALLEE sent to Jane Doe 6 on or about December 7, 2012, VALLEE stated, "Can I see your boobs [sic]. I will never bother you again if you show me. Deal? Show me your tits. [Nickname for Jane Doe 6]. Bitch show me those suckers . . . Show tits if you want facebook back. Show tits if you want facebook back. Do you want your facebook back [sic] I locked you out, [sic] of facebook this time. Show boobs. Do you want facebook back? Show boobs. Do you want facebook back? . . . Do you want me to leave you alone [sic]. Show me and I will stop."
53. For example, in a series of texts VALLEE sent to Jane Doe 6 on or about December 15, 2012, VALLEE stated, "Hello [first and last name of Jane Doe 6]. Do you want me to stop hacking you? I ordered a vibrator on amazon." When Jane Doe 6 told him that she

went to the police and that he would go to jail, VALLEE responded, “Show boobs and I will never bother you again. One Naked picture. Your password for aol and amazon is bouncethosetits.”

54. For example, in a series of texts VALLEE sent to Jane Doe 6 on or about December 21, 2012, VALLEE stated, “Has your vibrator arrived? . . . Has it arrived? Do you like it? I hope you use it, as you are the one who paid for it. Please answer me . . . If you don’t answer me I will order \$470.18 worth of stuff on amazon.” He continued, “Show me your boobs . . . I will order. You have three minutes. . . Show me. I have your card info.”

55. For example, in a series of texts VALLEE sent to Jane Doe 6 on or about March 18, 2013, VALLEE stated, “do you like your vibrator? Give me an answer.” He repeated that several times and stated, “if you show me your boobs i will stop bothering you. i only wish to see your big tits.”

#### **Jane Doe 7**

56. In or about 2012, Jane Doe 7 was locked out of, and unable to access, her accounts with her cell phone service provider and with her e-mail provider Google.

57. In or about April 2012, VALLEE sent multiple texts to Jane Doe 7, demanding that she provide him with a copy of a text she had recently received and notifying Jane Doe 7 that he had obtained one or more sexually explicit photographs of her. VALLEE threatening to send the sexually explicit photographs to others unless Jane Doe 7 sent him the text message and sent him additional sexually explicit photographs of herself. VALLEE also demanded that she perform specified sex acts for him while he listened over the phone.

58. For example, in a series of texts VALLEE sent to Jane Doe 7 on or about April 29, 2012, VALLEE stated, “[first name of Jane Doe 7] what is the text you just got . . . answer me or I will spread your nudes . . . Show me your boobs one last time . . . Keep ignoring me and I will spread these nudes . . . Don’t make me spread these.” He continued, “Do this and I will leave you alone forever.” VALLEE further stated, “Okay [first name of Jane Doe 7] look I am calling you so finger yourself on the phone or I sen . . . [sic] . . . Make sure your phone is on speaker beside your head . . . I will stop after you do this . . . Only if you finger yourself on the phone . . . Will you finger yourself . . . Answer me”

59. As proof, VALLEE sent via text to Jane Doe 7 one or more sexually explicit photographs of Jane Doe 7.

**Jane Doe 8**

60. In or about June 2013 and October 2013, VALLEE sent multiple texts and other online communications to Jane Doe 8, notifying her that he had obtained sexually explicit photographs of her classmates. As proof, he sent Jane Doe 8 one or more sexually explicit photographs of one of or more of Jane Doe 8’s classmates, many of whom were teenaged females. VALLEE demanded that Jane Doe 8 send him sexually explicit photographs of herself or show him sexually explicit video images of herself. He threatened to distribute the sexually explicit photographs of her classmates to others if Jane Doe 8 did not comply with his demands.

61. For example, in a series of Facebook messages VALLEE sent to Jane Doe 8 on or about June 24, 2013, VALLEE stated, “[nickname of first name of Jane Doe 8’s friend, also a teenaged female] has been hacked. Show me your boobs or I shall spread nude photos of twenty girls from your high school. I loved the photo of your tits from prom 2012 where

you pulled them out. let [sic] me see again.” VALLEE sent an attachment with sexually explicit photographs of Jane Doe 8 and two of her classmates, including Jane Doe 7 and Jane Doe 12, who were also teenaged females. VALLEE continued, “THIS IS YOUR FINAL CHANCE. Do not ruin these girls [sic] lives like a bitch. Suck it up and pull the tits out for two minutes [on Skype]. You took them out at prom.”

62. For example, in a series of texts VALLEE sent to Jane Doe 8 on or about October 16, 2013, VALLEE stated “don’t ruin their lives. I will never bother you again [sic] I swear please show me . . . I know you pulled your boobs out a prom. I want to see them. If you show me I will never bother you again.”

63. For example, in a series of texts VALLEE sent to Jane Doe 8 on or about October 17, 2013, VALLEE stated, “Take off your bra and send nude pics. Want to see nude pics of [listing the name of Jane Doe 8’s friend, also a teenaged female].” He warned her not to “ruin their lives.”

#### **Jane Doe 9**

64. In or about January 2013, VALLEE hacked into the Amazon.com account and Facebook account belonging to Jane Doe 9, took control of her Facebook account, and locked Jane Doe 9 out of her Facebook account.

65. In or about January 2013, after hacking into Jane Doe 9’s Amazon.com account, VALLEE used, without authorization, Jane Doe 9’s payment card information that was electronically stored in her Amazon.com account. He purchased, and shipped to Jane Doe 9’s home address, merchandise of a sexual nature. This included items called a “remote rick vibrating dildo” and “California exotics waterproof delights blue jelly.”



VALLEE also purchased from Jane Doe 9's Amazon.com account several adult entertainment videos, available to download or watch on demand.

66. In or about January 2013, VALLEE sent Jane Doe 9 a series of texts in which he notified Jane Doe 9 that he had hacked into her Facebook account, and he would give her access to her account only if she sent him sexually explicit photographs of herself. He also stated that knew her payment card number and would buy items of a sexual nature from her account unless she sent him sexually explicit photographs of herself. As proof, he sent her a text containing the last four digits of her payment card number.

67. For example, in a series of texts VALLEE sent to Jane Doe 9 on or about January 22, 2013, VALLEE stated, "I want a nude photo . . . I will trade you your facebook for nude photo. I will leave your facebook alone if you send me a nude photo. Do we have a deal? [Jane Doe 9's first name] send me the photo and you can have facebook back." VALLEE continued, "trade photo for facebook . . . a nude photo [sic] photo for facebook. Deal? Send photo. The sooner you show me the sooner facebook will be yours." VALLEE then stated, "Do you want your facebook [sic]. Do you want your facebook. [sic]. Are you going to take the photo? Send nude photo get facebook back. Don't send nude photo debit card is charged. Ends in 8123. Amazon. Send the photo. \$200 will be charged if photo is not sent by 10:30. Thirty dollars was just spent [sic] you have until 10:30. You have one minute. I am charging your debit card now. Send a naked photo and I won't [sic] hope you enjoy vibrators you're getting alot [sic]" VALLEE continued, "Send me a nude photo [sic] I will cancel the orders I made and return facebook . . . Get Naked."

68. In or about January 2013, VALLEE, having hacked into and taken control over Jane Doe 9's Facebook account, posted onto Jane Doe 9's Facebook page a receipt from Amazon.com that indicated that Jane Doe 9 had purchased a vibrator for herself. VALLEE, using Jane Doe 9's Facebook account and posing as Jane Doe 9, also sent Facebook messages to Jane Doe 9's Facebook "friends" that stated that Jane Doe 9 purchased a vibrator.

**Jane Doe 10**

69. On or about July 2012, VALLEE sent multiple text messages and Facebook messages to Jane Doe 10, notifying her that he had hacked into her e-mail accounts and telling her that he would send sexually explicit photographs of her friends to others unless she sent him sexually explicit photographs of herself to him. As proof, VALLEE sent Jane Doe 10 one or more sexually explicit photographs of two of her classmates, Jane Doe 12 and one other teenaged female. VALLEE warned Jane Doe 10 that he would send the photographs to others unless Jane Doe 10 sent him the photographs he demanded. He told Jane Doe 10, "don't ruin their lives."

70. On or about August 22, 2012, VALLEE sent multiple texts to Jane Doe 10 notifying her that he had obtained a copy of her social security card and that if she did not send one or more sexually explicit photographs of herself, he would distribute Jane Doe 10's social security number to others. As proof, VALLEE sent Jane Doe 10 a copy of Jane Doe 10's social security card. VALLEE directed Jane Doe 10 to send the demanded photograph to the e-mail account "taunyas\_lover@yahoo.com."

**Jane Doe 11**

71. In or about October 2011, VALLEE sent Jane Doe 11 numerous Facebook messages to stating, “show me your tits,” and informing Jane Doe 11 that he masturbated to her photographs, that her “ass made [his] dick hard,” and that “[his] hobbie [sic] is masturbating [sic] im [sic] addicted.”
72. In or about July 2012, VALLEE hacked into the Facebook account and Google e-mail account belonging to Jane Doe 11, took control of the accounts, and locked Jane Doe 11 out of her accounts.
73. In or about July 2012, VALLEE sent multiple texts to Jane Doe 11 telling her that he would delete her Facebook account unless she told him the phone number of one of her friends. VALLEE then demanded that Jane Doe 11 send him a suggestive photograph of herself, and, in exchange, he would return access to her various online accounts.
74. For example, in a series of texts that VALLEE sent to Jane Doe 11 on or about July 9, 2012, VALLEE stated “What is [Jane Doe 11’s female friend’s first and last name] number . . . Tell me her number or I will delete your facebook.” VALLEE demanded, “Okay show butt and I tell you passwords for all of your online accounts. Will you do that [sic].” When Jane Doe 11 begged him to leave her alone, VALLEE responded, “Now show me. . . . I will delete your facebook. Sorry this is the only way. Will you show me [sic]. What will you do [sic]. Make a list of what you’re willing to do.”
75. At this point during the texting exchange, Jane Doe 11 provided her cell phone to a law enforcement officer and consented to allow the law enforcement officer to assume Jane Doe 11’s identity and continue to communicate with VALLEE to gather more information.

**Jane Doe 12**

76. Over the course of several months in or about 2011-2012, VALLEE sent multiple texts and other electronic communications to Jane Doe 12, demanding that she send him sexually explicit photographs of herself and warning her that he would not leave her alone until she did so.
77. On or about March 9, 2012, Jane Doe 12 complied with VALLEE's repeated demands and sent him via text a sexually explicit photograph of herself, along with the attached text message: "have a nice life douchebag. I hate you."
78. In or about September 2012, VALLEE created a Facebook page, using a Facebook account name that was virtually identical to Jane Doe 12's real Facebook account name, with one difference: Jane Doe 12's last name had one letter misspelled. On the fake Jane Doe 12 Facebook page that VALLEE created, VALLEE posted sexually explicit photographs of Jane Doe 12.
79. In or about September 2012, VALLEE sent multiple texts to Jane Doe 12, demanding that she provide him with her e-mail address, notifying her that he had obtained sexually explicit photographs of her, and notifying her that he had set up a fake Facebook page for her. He threatened to send the sexually explicit photographs to others unless she complied with his demands. VALLEE then sent Jane Doe 12 one or more sexually explicit photographs of Jane Doe 12. He also sent Jane Doe 12 the account name of the fake Facebook page that VALLEE had created.
80. For example, in a series of texts VALLEE sent to Jane Doe 12 on or about September 29-30, 2012, VALLEE stated, "[nickname of Jane Doe 12] tell me your email I leave you alone. [inserting link with one or more sexually explicit photographs of Jane Doe 12].

Perhaps I will send these photos to [first name of male acquaintance of Jane Doe 12's] if you don't answer. Do you want this to end . . . Search for [first name and last name of Jane Doe 12, with one letter of last name misspelled] on facebook. I sent your boyfriend a friend request with it. Hegehe. Tell me your email I will delete this fake profile.

Perhaps I shall add your teachers. [First name and last name of acquaintance of Jane Doe 14's] accepted your friend request. Do you want me to take it down [sic]."

81. For example, in or about March 20, 2013, VALLEE sent a series of Facebook messages to Jane Doe 12, with attachments containing sexually explicit photographs of Jane Doe 12. VALLEE stated, "I am posting these around bathrooms and locker room if you don't skype. I am sending to [first name of male acquaintance of Jane Doe 12] right now. I know you are reading these messages. Do I have to send your photos to everyone? Go on skype . . . You showed me your tits. Show me on skype and I will stop. Okay no more talking to you, no showing people. Show me on skype [first name of Jane Doe 12] Please."

### **Jane Doe 13**

82. In or about March 2011, VALLEE sent multiple Facebook messages to Jane Doe 13 asking her to send him sexually explicit photographs of herself.
83. In or about March and April 2012, VALLEE sent multiple texts to Jane Doe 13, notifying her that he had obtained sexually explicit photographs of several of her friends and offering to send them to Jane Doe 13 in exchange for sexually explicit photographs of Jane Doe 13. As proof, VALLEE sent one or more texts to Jane Doe 13 containing dozens of sexually explicit photographs of other teenaged females.

84. For example, in a series of texts VALLEE sent to Jane Doe 13 on or about March 28, 2012, VALLEE stated “[First name of Jane Doe 13,] if I give you alott [sic] of naked pictures of [first names of Jane Doe 1, Jane Doe 7, and two other classmates of Jane Doe 13] can I have 4 or 5 of you? Do we have a deal [first name of Jane Doe 13]? That picture is just a sample I have alot [sic] more.” As proof, VALLEE texted to Jane Doe 13 a suggestive photograph of Jane Doe 7.
85. For example, in a series of texts VALLEE sent to Jane Doe 13 on or about April 16, 2012, VALLEE claimed to be Jane Doe 4, who was a classmate of Jane Doe 13’s. When Jane Doe 13 stated that she did not believe that he was Jane Doe 7, VALLEE continued, “Sending dirty pics. Now do you believe me.” He continued, “Your turn to send nudes of yourself. Omg! [First name of Jane Doe 13]!!!! Your [sic] so hot!! Can I have a naked pic gurl [sic]. Sex me.”
86. On or about April 16, 2012, VALLEE texted to Jane Doe 13 approximately 30-40 sexually explicit photographs of other teenaged females, including Jane Doe 7, many of whom were classmates of Jane Doe 13.

**COUNTS ONE THROUGH EIGHTEEN**  
**18 USC § 875(d)**  
**(Interstate Threats as to Jane Doe 1, Jane Doe 2, Jane Doe 3**  
**Jane Doe 4, Jane Doe 5, Jane Doe 6, Jane Doe 7, Jane Doe 8,**  
**Jane Doe 9, Jane Doe 10, Jane Doe 11, and Jane Doe 12)**

87. The Grand Jury re-alleges and incorporates by reference paragraphs 1-86 of this

Indictment and further charges that:

On or about the dates set forth below, in the District of New Hampshire and elsewhere,  
defendant

RYAN J. VALLEE,

with intent to extort from any person, namely Jane Doe 1-Jane Doe 12 as set forth below,  
a thing of value, namely, sexually explicit images of Jane Doe 1-Jane Doe 12, transmitted  
in interstate commerce a communication containing a threat to injure the property,  
namely, to delete, deface, or make purchases from their online accounts, and to injure the  
reputation of the addressee and of another, namely, to widely distribute sexually explicit  
photographs of the addressee and of another.

All in violation of Title 18, United States Code, Section 875(d).

<b>Count Number</b>	<b>Victim Name</b>	<b>Type and Approximate Date of Electronic Communication Transmitted</b>
1	Jane Doe 1	Texts on August 2, 2012
2	Jane Doe 2	Texts on July 17, 2012
3	Jane Doe 3	Texts on July 25, 2012
4	Jane Doe 4	Texts on April 16, 2012
5	Jane Doe 4	Facebook messages on September 24, 2012
6	Jane Doe 4	Texts on January 19, 2013

7	Jane Doe 5	Texts on April 23, 2012
8	Jane Doe 6	Texts on December 7, 2012
9	Jane Doe 6	Texts on December 15, 2012
10	Jane Doe 6	Texts on December 21, 2012
11	Jane Doe 7	Texts on April 29, 2012
12	Jane Doe 8	Texts on June 24, 2013
13	Jane Doe 8	Texts on October 16-17, 2013
14	Jane Doe 9	Texts on January 22, 2013
15	Jane Doe 10	Texts on August 22, 2012
16	Jane Doe 11	Texts on July 9, 2012
17	Jane Doe 12	Texts on September 29, 2012
18	Jane Doe 12	Facebook messages on March 20, 2013



**COUNTS NINETEEN AND TWENTY**  
**18 USC §§ 1030 (a)(2)(C), (c)(2)(B)**  
**(Computer Fraud and Abuse as to Jane Doe 6 and Jane Doe 9)**

88. The Grand Jury re-alleges and incorporates by reference paragraphs 1-86 of this

Indictment and further charges that:

On or about the dates set forth below, in the District of New Hampshire and elsewhere,  
defendant

RYAN J. VALLEE,

intentionally accessed a computer, namely the service provider's computer associated with the online accounts described below, without authorization and exceeded authorized access, and thereby obtained information from any protected computer, namely a server of the service provider described below, and the offense was committed in furtherance of any criminal and tortious act in violation of the laws of the United States and any State, namely wire fraud in violation of 18 U.S.C. § 1343 and interstate threats in violation of 18 U.S.C. § 875.

All in violation of Title 18, United States Code, Section 1030(a)(2)(C), (c)(2)(B).

<b>Count Number</b>	<b>Account Holder Victim Name</b>	<b>Approximate Date of Unauthorized Access</b>	<b>Account Accessed Without Authorization</b>
19	Jane Doe 6	December 7, 2012	Amazon account
20	Jane Doe 9	January 22, 2013	Amazon account

**COUNTS TWENTY ONE THROUGH THIRTY**  
**18 USC § 1030(a)(7)**  
**(Computer Fraud and Abuse as to Jane Doe 1, Jane Doe 2, Jane Doe 3,**  
**Jane Doe 4, Jane Doe 5, Jane Doe 6,**  
**Jane Doe 9, and Jane Doe 11)**

89. The Grand Jury re-alleges and incorporates by reference paragraphs 1-86 of this

Indictment and further charges that:

On or about the dates set forth below, in the District of New Hampshire and elsewhere,  
defendant

RYAN J. VALLEE,

with intent to extort from any person a thing of value, namely, sexually explicit images, transmitted in interstate commerce a communication containing a threat to cause damage to a protected computer; a threat to obtain information from a protected computer without authorization and in excess of authorization and to impair the confidentiality of information obtained from a protected computer without authorization and by exceeding authorized access; and a demand and request for a thing of value, namely sexually explicit images, in relation to damage to a protected computer, where such damage was caused to facilitate the extortion.

All in violation of Title 18, United States Code, Section 1030(a)(7).

<b>Count Number</b>	<b>Account Holder Victim Name</b>	<b>Type and Approximate Date of Electronic Communication Transmitted</b>	<b>Service Provider Account(s) Threatened</b>
21	Jane Doe 1	Texts on August 2, 2012	Facebook account
22	Jane Doe 2	Texts on July 17, 2012	Instagram account
23	Jane Doe 3	Texts on July 25, 2012	Facebook account and Google account
24	Jane Doe 4	Texts on April 16, 2012	Facebook account

25	Jane Doe 4	Texts on January 19, 2013	Facebook account and Yahoo! account
26	Jane Doe 5	Texts on April 23, 2012	Facebook account
27	Jane Doe 6	Texts on December 7, 2012	Facebook account
28	Jane Doe 6	Texts on December 15, 2012	Amazon account and AOL account
29	Jane Doe 9	Texts on January 22, 2013	Amazon account and Facebook account
30	Jane Doe 11	Texts on July 9, 2012	Facebook account

**COUNTS THIRTY ONE THROUGH THIRTY EIGHT**  
**18 USC § 1028A**  
**(Aggravated Identity Theft as to Jane Doe 1, Jane Doe 2, Jane Doe 3,**  
**Jane Doe 4, Jane Doe 5, Jane Doe 6,**  
**Jane Doe 9, and Jane Doe 11)**

90. The Grand Jury re-alleges and incorporates by reference paragraphs 1-86 of this

Indictment and further charges that:

On or about the dates set forth below, in the District of New Hampshire and elsewhere,  
defendant

RYAN J. VALLEE,

during and in relation to a felony violation enumerated in 18 U.S.C. § 1030 as charged  
above in Counts 19 through 30, knowingly transferred, possessed, and used, without  
lawful authority, a means of identification of another person, namely, the account log-in  
credentials of the individuals described below, as well as and the account log-in  
credentials and the payment card information of the individuals described as Jane Doe 6  
and Jane Doe 9 below,

All in violation of Title 18, United States Code, Section 1028A(1).

<b>Count Number</b>	<b>Account Holder Victim Name</b>	<b>Approximate Date of Possession and Use of Victim's Means of Identification</b>	<b>Related to Unauthorized Access to Service Provider Account</b>	<b>Related Count</b>
31	Jane Doe 1	August 2, 2012	Facebook account	21
32	Jane Doe 2	July 17, 2012	Instagram account	22
33	Jane Doe 3	July 25, 2012	Facebook account and Google account	23

34	Jane Doe 4	April 16-24, 2012	Facebook account	24
35	Jane Doe 4	January 19, 2013	Facebook account and Yahoo! account	25
36	Jane Doe 5	April 23, 2012	Facebook account	26
37	Jane Doe 6	December 7-15, 2012	Facebook account and Amazon account	19, 27, 28
37	Jane Doe 9	January 22, 2013	Facebook account and Amazon account	20, 29
38	Jane Doe 11	July 9, 2012	Facebook account	30

Dated: February 10, 2016

TRUE BILL

/s/ Foreperson  
Grand Jury Foreperson

EMILY GRAY RICE  
United States Attorney

By: /s/ Arnold H. Huftalen  
Arnold H. Huftalen  
Assistant U.S. Attorney

/s/ Mona Sedky  
Mona Sedky  
Senior Trial Attorney  
U.S. Department of Justice